

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
AT MEMPHIS**

MILTON RHEA,)	
)	
Plaintiff,)	
)	
v.)	
)	No.
WEST TENNESSEE VIOLENT)	
CRIME & DRUG TASK FORCE and)	
SHELBY COUNTY GOVERNMENT,)	
)	
Defendants.)	

NOTICE OF REMOVAL

Please take notice that, pursuant to 28 U.S.C. §§ 1441 and 1446, Defendant, West Tennessee Violent Crime & Drug Task Force, hereby removes this action, commenced by the Plaintiff in the Chancery Court for Shelby County, Tennessee, in which all jurisdictional requirements imposed by 28 U.S.C. § 1331 have been met.

Defendant, West Tennessee Violent Crime & Drug Task Force, states:

1. This action was commenced in the Chancery Court for Shelby County, State of Tennessee, and assigned docket number CH-17-0444-2. (*See* Summons and Complaint). This is a civil action asserting claims for relief pursuant to 29 U.S.C. §§ 201, *et seq.* (Fair Labor Standards Act).

2. Defendant, West Tennessee Violent Crime & Drug Task Force, was served with a Summons and Complaint on March 31, 2017.

3. Pursuant to 28 U.S.C. § 1441(b), this action is removed by Defendant, West Tennessee Violent Crime & Drug Task Force.

4. This Court has original jurisdiction of this action under 28 U.S.C. § 1331 and removal to this Court is appropriate under 28 U.S.C. §§ 1141 and 1446.

5. Venue is proper in this District.

6. Counsel for Defendant, West Tennessee Violent Crime & Drug Task Force has consulted with counsel for Defendant, Shelby County Government, who has consented to removing this case to federal court.

7. Copies of all process, pleadings, and orders served upon the Defendant in the State Court are attached hereto. Notice of Removal is being filed in the state court contemporaneously with this filing.

THEREFORE, having met all of the requirements for removal under 28 U.S.C. § 1441 and 1446, including the presence of all jurisdictional requirements established by 28 U.S.C. § 1331, Defendant, West Tennessee Violent Crime & Drug Task Force, gives notice of removal of the captioned case to the United States District Court for the Western District of Tennessee at Memphis.

Respectfully submitted,

HERBERT H. SLATERY III
ATTORNEY GENERAL AND REPORTER

/s/James R. Newsom III

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CERTIFICATE OF SERVICE

I hereby certify that on April 19, 2017, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated of the electronic filing receipt. Parties were sent a true and correct copy of the foregoing via US mail, first class postage prepaid, to the following:

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/s/James R. Newsom III

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Special Counsel